

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BLAKE LIVELY,

Plaintiff,

-v-

WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, STEVE
SAROWITZ, IT ENDS WITH US MOVIE LLC,
MELISSA NATHAN, THE AGENCY GROUP PR
LLC, JENNIFER ABEL, JED WALLACE, and
STREET RELATIONS INC.,

Defendants.

Case No. 1:24-cv-10049-LJL
(consolidated with 1:25-cv-00449-LJL)

WAYFARER STUDIOS LLC, JUSTIN
BALDONI, JAMEY HEATH, IT ENDS WITH US
MOVIE LLC, MELISSA NATHAN, JENNIFER
ABEL, and STEVE SAROWITZ,

Consolidated Plaintiffs,

-v-

BLAKE LIVELY, RYAN REYNOLDS, LESLIE
SLOANE, VISION PR, INC., and THE NEW
YORK TIMES COMPANY.

Consolidated Defendants.

**DECLARATION OF MATTHEW F. BRUNO
IN OPPOSITION TO DEFENDANTS' MOTION TO COMPEL**

I, Matthew F. Bruno, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice before this Court, a partner in the law firm of Manatt, Phelps & Phillips, LLP, 7 Times Sq., New York, NY, 10036, and counsel of record for Plaintiff Blake Lively in the above-captioned action.

2. I respectfully submit this declaration in opposition to Defendants Wayfarer Studios LLC (“Wayfarer”), Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel’s (collectively, the “Wayfarer Parties”) motion to compel (ECF No. 405 (the “Motion”)).

3. On July 9, 2025, I met and conferred with counsel for the Wayfarer Parties, together with other counsel for Ms. Lively. During the conferral, the parties discussed Ms. Lively’s computation of damages, response to Interrogatory No. 8, and response to Request for Production No. 254 (the “Net Worth RFP”).

4. During the conferral, counsel for Ms. Lively explained that the Wayfarer Parties’ request for a computation of damages was premature, because it necessarily requires expert analysis and will be provided through expert disclosures.

5. With respect to the Net Worth RFP, counsel for Ms. Lively further explained, among other things, that evidence of Ms. Lively’s personal net worth is not relevant to any of her claims and that the Wayfarer Parties have failed to articulate any basis for overcoming Ms. Lively’s constitutional right to privacy in her personal financial affairs.

6. During the conferral, counsel for Ms. Lively reiterated her agreement to produce documents regarding the damages that Ms. Lively seeks in this matter and are within her possession, custody, or control or are otherwise reasonably accessible. Counsel for Ms. Lively further explained that financial information relating to her businesses (i.e., Family Hive LLC d/b/a Blake Brown Beauty and Betty Buzz LLC) are not within her possession, custody, or control and, despite diligently pursuing this information, she has not obtained further responsive information. As such, counsel for Ms. Lively informed the Wayfarer Parties that obtaining these financial records may require third party subpoenas under Rule 45 of the Federal Rule of Civil Procedure.

To the best of my knowledge, the Wayfarer Parties have not separately pursued discovery directly with these entities.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: July 14, 2025

/s/ Matthew F. Bruno

MANATT, PHELPS & PHILLIPS, LLP
Matthew F. Bruno
7 Times Sq.
New York, NY 10036
(212) 790-4500
mbruno@manatt.com

Counsel for Blake Lively